



May 30, 2023

**Via ECF**

The Honorable Gabriel W. Gorenstein  
United States Magistrate Judge  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, New York 10007

*Re: In re: New York City Policing During Summer 2020 Demonstrations,  
No. 20-CV-8924  
This Filing is Related to All Cases*

Dear Judge Gorenstein:

We represent the Plaintiffs in *Payne* and write respectfully on behalf of all non-stayed cases further to our letter dated May 25, 2023 requesting a conference to compel the deposition of Chief Kenneth Lehr before June 14. *See* ECF 1014. On May 30, Defendants confirmed that they will produce Chief Lehr for a deposition on Tuesday, June 13 and will produce his responsive text messages by June 6. Accordingly, Plaintiffs withdraw their letter motion at ECF 1014.

Thank you for your time and consideration of this matter.

Respectfully submitted,

NEW YORK CIVIL LIBERTIES UNION  
FOUNDATION

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Cc: All counsel of record by ECF